

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

JOHN DOE,)
)
Plaintiff,)
v.) Civil Action No. 6:19-CV-00023
)
WASHINGTON AND LEE UNIVERSITY)
)
Defendants.)

**DEFENDANT'S PROPOSED ADDITIONAL QUESTIONS FOR JURY TRIAL
QUESTIONNAIRE**

Defendant Washington and Lee University, by counsel, proposes the following additional questions for this Court's Jury Trial Questionnaire (ECF 84-1):

1. Are you currently scheduled to receive a dose of a COVID-19 vaccine?
If yes, please explain.
2. Are you presently registered to be notified about the availability of a COVID-19 vaccine?
If yes, please explain.
3. Do you personally know the Honorable Norman K. Moon, the Honorable Robert S. Ballou, Andrew S. Gallinaro, David G. Harrison, Patricia M. Hamill, R. Craig Wood, Micah B. Schwartz, or Benjamin P. Abel?
If yes, please explain.
4. Do you have any knowledge of the law firms of Conrad O'Brien, P.C., The Harrison Firm, P.C., or McGuireWoods LLP?
If yes, please explain.
5. Have you or a close family member ever attended or been employed by Washington & Lee University?
If yes, please explain.

6. Did you attend a four-year college or university?

If yes, please explain.

7. Have you ever been suspended or expelled from a college or university, or been charged with an offense that might have resulted in suspension or expulsion?

If yes, please explain.

8. Have you or an immediate family member been the victim of a sexual assault? If so, was it resolved to your satisfaction?

If yes, please explain.

Dated: April 21, 2021

Respectfully submitted,

WASHINGTON & LEE UNIVERSITY

By: _____/s/_____

R. Craig Wood (VSB # 24264)
Micah B. Schwartz (VSB # 77299)
Benjamin P. Abel (VSB # 88961)
MC GUIRE WOODS LLP
652 Peter Jefferson Parkway, Ste. 350
Charlottesville, VA 22902
(Office) (434) 977-2558
(Fax) (434) 980-2274
cwood@mcguirewoods.com
mschwartz@mcguirewoods.com
babel@mcguirewoods.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 21st of April 2021, a true copy of the foregoing was filed with the Court using the CM/ECF system, which will send notification of such filing to the following:

David G. Harrison (VSB #17590)
THE HARRISON FIRM, PC
5305 Medmont Circle SW
Roanoke, VA 24018
Tel: (540) 777-7100
Fax: (540) 777-7101
david@harrisonfirm.us

Patricia M. Hamill (Pa. I.D. No. 48416)
CONRAD O'BRIEN PC
1500 Market Street, Centre Square
West Tower, Suite 3900
Philadelphia, PA 19102
Tel: (215) 864-9600
Fax: (215) 864-9620
phamill@conradobrien.com

/s/
R. Craig Wood (VSB # 24264)
Micah B. Schwartz (VSB # 77299)
Benjamin P. Abel (VSB # 88961)
MCGUIREWOODS LLP
652 Peter Jefferson Parkway, Ste. 350
Charlottesville, VA 22902
(Office) (434) 977-2558
(Fax) (434) 980-2274
cwood@mcguirewoods.com
mschwartz@mcguirewoods.com
babel@mcguirewoods.com

Counsel for Defendant